

# **Overview of Proposed Amendments to California's Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products**

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## **Air Resources Board**

# Overview

- Implementation Status
- Proposed Amendments
- Efforts to Harmonize with U.S. EPA's  
Proposed Regulation
- Next Steps
- Questions



# Implementation Status

- CARB airborne toxic control measure (ATCM) reduces formaldehyde emissions from three types of composite wood panels: particleboard (PB), hardwood plywood (HWPW), & medium density fiberboard (MDF)
- Lower Phase 2 emission standards all in effect (range from 0.05 ppm for HWPW to 0.13 ppm for thin MDF)
- Applies to products sold, supplied, used, or manufactured for sale in California

# Implementation Status

## *continued*

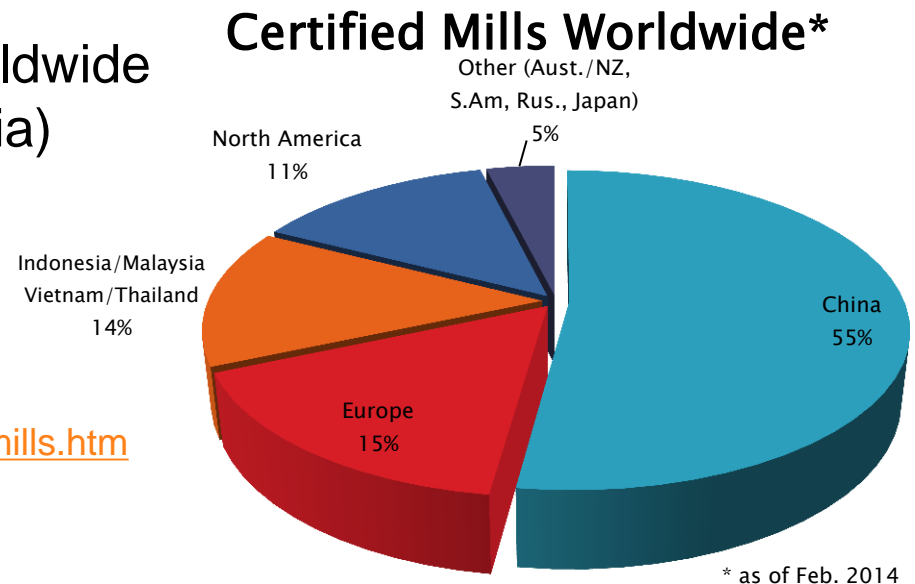
- Requires finished goods to be made from compliant HWPW, PB and MDF panels
- Examples of finished goods include flooring, furniture and cabinets
- Industry sectors affected by ATCM include:
  - panel manufacturers
  - fabricators of finished goods
  - distributors, importers and retailers of panels & finished goods
- IWPA has been and continues to be a key industry stakeholder

# Implementation Status

## *continued*

- Third Party Certification (TPC) Program
  - Panel manufacturers must be third party certified by CARB-approved certifiers
  - TPCs provide two main services:
    - testing & product certification
  - 40 CARB-approved TPCs worldwide (North America, Europe, & Asia)
  - About 900 certified mills
  - CARB website featuring certified mills:

<http://www.arb.ca.gov/toxics/compwood/tpc/listofmills.htm>



# Implementation Status

*continued*

- NAF/ULEF Program
  - ATCM allows TPC exemption for manufacturers using no-added formaldehyde (NAF) or ultra-low-emitting formaldehyde (ULEF) resin systems
  - 170 CARB-approved NAF and ULEF manufacturers

# Implementation Status

## *continued*

- Enforcement
  - Numerous inspections conducted at panel retailers, distributors, & retailers of finished goods
  - Initial focus on increasing awareness of regulatory requirements
  - Samples collected for emissions testing
  - Evaluation of enforcement testing results will include the uncertainty associated with emissions testing and sample preparation of finished goods
  - Several enforcement cases underway

# Proposed Amendments - Objectives

- Clarify requirements and applicability
- Improve enforceability
- Align ATCM with proposed U.S. EPA regulations to extent practicable
  - Encourage U.S. EPA to adjust federal proposal where appropriate
- Propose ATCM amendments for consideration by CARB's Board after U.S. EPA regulation finalized



# Proposed Amendments

*continued*

- Proposed amendments to panel manufacturer requirements
  - Require platforms used to make HWPW to meet applicable Phase 2 emission standard
  - Require HWPW with bamboo or cork veneer to comply with the ATCM
  - Considering including 2-ply HWPW & lumber core HWPW to align with U.S. EPA regulation

# Proposed Amendments

*continued*

- Other proposed amendments
  - Third party certification program
    - clarify and tighten requirements
    - proficiency requirements for inter-laboratory comparisons
  - Additional criteria for hardboard
  - Labeling
    - partial bundles of panels
    - product labels from suppliers
  - Additional requirements for laminated products

# Proposed Amendments

*continued*

- Laminated products – current ATCM approach
  - Applies to laminated products made by fabricators
    - laminates consisting of wood veneer or synthetic material
  - Requires use of certified platform material
  - Testing revealed opportunities to reduce emissions

# Proposed Amendments

*continued*

- **Proposal for laminated products**
  - Establish new formaldehyde emission performance standard for unfinished laminated products of 0.13 ppm
  - Standard would apply to laminated products consisting of unfinished wood veneer affixed to certified platform
  - Synthetic laminated products still need certified platform
  - No routine emissions testing or third party certification would be required
  - Benefit: achieves additional emission reductions beyond current ATCM by ensuring laminated products do not emit more than certified platform

# Efforts to Harmonize with U.S. EPA's Proposed Regulation

- Ongoing, productive discussions between U.S. EPA & CARB staff
  - U.S. EPA participation in CARB workshops and discussion sessions
- Laminated products
- Third party certification
  - Evaluating reciprocity mechanism to acknowledge TPCs approved by CARB
- Other

# Next Steps

- 4<sup>th</sup> public workshop on proposed amendments
  - Scheduled for March 18, 2014 in Sacramento
  - Additional workshops later this year if needed
- CARB's Board consideration in late 2014 or early 2015
  - Timing dependent on when U.S. EPA regulations are finalized

# Questions



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